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MCAS EL TORO
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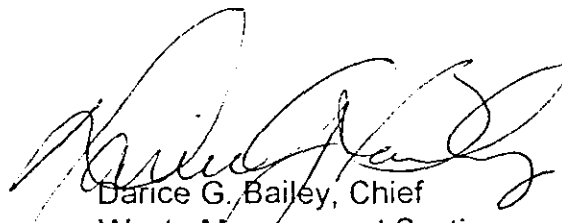
Date: July 27, 2001

To: Ms. Triss Chesney
Department of Toxic Substances Control (DTSC), Region 4
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Cypress, California 90630

From: Environmental Management Branch
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Subject: *Review of the Draft Technical Memorandum, Phase II Evaluation of Radionuclides in Groundwater at Former Landfill Sites and the EOD Range, Marine Corps Air Station (MCAS) El Toro, California, July 2001.*

Attached are The Department of Health Services' (DHS) comments on the subject report. This review was performed by Mr. Kurt Jackson and Ms. Deirdre Dement, Associate Health Physicists, in support of the Interagency Agreement between DTSC and DHS. If you have any questions concerning this review, or if you need additional information, please contact Ms. Dement at (916) 324-1378.



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received
8/2/01

Department of Health Services

Review of Draft Technical Memorandum, Phase II Evaluation of Radionuclides in Groundwater at Former Landfill Sites and the EOD Range, Marine Corps Air Station, El Toro, California

July 27, 2001

DTSC Resource Planning Form # 579

The following comments are in response to the request from Ms. Triss Chesney of the Department of Toxic Substances Control to review the *Draft Technical Memorandum, Phase II Evaluation of Radionuclides in Groundwater at Former Landfill Sites and the EOD Range, Marine Corps Air Station (MCAS) El Toro*, dated July 2001. This document was reviewed by Mr. Kurt Jackson and Ms. Deirdre Dement of DHS.

General Comments:

1. The subject document is well written and includes appropriate information. Based on this report DHS concurs that the uranium found in the groundwater at this time is naturally occurring.

Specific Comments:

1. Executive summary, Page i, recommends reevaluation of CERCLA Groundwater Monitoring Plan with respect to the need for radionuclide monitoring. The conclusions on Page 5-1 also suggest possible revision of the record-of-decision based on this study. It should be noted that the current lack of radionuclide contamination in groundwater does not speak to the radiological content of landfills, which has not yet reached the groundwater. Therefore the need or lack of need for radionuclide groundwater monitoring in the future will depend on the knowledge of what went into the landfills and what was used at the site more than it will depend on the results of this study.
2. Page 1-7, Lines 1 and 2, should read Environmental Management Branch instead of Radiological Services Branch.
3. Page 2-4 first paragraph under General Chemistry does not mention whether stable isotope samples were filtered. However, on Page 3-1 it is stated that the stable isotope samples were unfiltered, but this seems to be contradicted by the sentence above that, which indicates that the samples collected for uranium analysis (which were filtered) were also measured for stable isotopes. Clarification of these statements is needed. The basis for selecting filtered or unfiltered samples for stable isotope analysis should also be stated on Page 2-4.
4. The footnotes on Table 3-2, Page 3-5 should specify the conversion between tritium units (TU) and pCi per liter. Tritium Units are not a unit familiar to most individuals

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DHS' Review of *Draft Technical Memorandum, Phase II Evaluation of Radionuclides in Groundwater at Former Landfill Sites and the EOD Range, Marine Corps Air Station, El Toro, California.*

July 27, 2001

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who may be reviewing the document and drinking water standards are stated in units of pCi per liter. The conversion factor is given on Page vii under the acronyms and abbreviations section.